

Williams AFB – Resolution of Informal Dispute and Path Forward for Site ST012:

EBR Activities will be implemented as a Pilot Study over an 18-36 month timeframe:

- A.** The RDRA Work Plan Addendum 2 will be renamed Pilot Study Implementation Work Plan. The overall goals will include evaluating the effectiveness of EBR on the dissolved phase constituents in achieving the Remedial Action Objectives (RAOs) of the 2013 Record of Decision Amendment (RODA).
- B.** EBR as presented in the Pilot Study Implementation Work Plan may not sufficiently address LNAPL source control in order to achieve RAOs based on the current understanding of Site conditions. Data obtained from the Pilot Study will be used to determine if additional EBR or other appropriate technology implementation is needed to achieve the RAOs in the desired 20-year time frame.
- C.** The Air Force will move forward with the proposed EBR injections.
- D.** EPA, ADEQ, and the Air Force would collaboratively work together using the Pilot Study Work Plan Decision Matrix as a starting point to establish specific milestones and metrics to evaluate EBR performance, continuously updating the matrix and the framework for the deliverable noted in item F below.
- E.** Periodic monitoring of the Pilot Study will be performed by the Air Force in consultation with the Agencies. Technical comments previously submitted by the Agencies remain to be addressed.
- F.** Required ‘Deliverable’ is due no later than 36 months from the initial Pilot Study injections; the Air Force will complete a Pilot Study Implementation Report. The metrics and content of this Report will be established throughout the 18-36 month timeframe, with the goal of having an agreed upon framework to evaluate EBR’s primary goal (i.e., achieving RAOs within the 20-year remedial timeframe specified in the 2013 RODA).
- G.** If the pilot study fails to demonstrate that the 20-year timeframe to meet RAOs can be met, the agencies may pursue formal dispute in accordance with the FFA.

All parties reserve their rights under the FFA Section 12. The parties would furthermore understand and agree that EBR may not be the sole remedial technology necessary at ST012 to achieve the RAOs within a desired timeframe. If EBR fails to meet performance milestones and metrics, other potential remedial technologies will be evaluated and included in the Pilot Study Implementation Report.

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